

REMARKS

Claims 14-28 are pending in this application. Claims 14 and 16 are amended to more particularly define the claimed subject matter. No new matter is added. Support for the amendment to claims 14 and 16 may be found in the application as filed at, for example, para. 31 and Fig. 1.

The 112 Rejections

Applicants have amended claims 14 and 16 to more particularly define the claimed subject matter. Applicants believe that these amendments obviate the §112 rejections, and respectfully request reconsideration and withdrawal of the same.

The 103(a) Rejections

Amended independent claim 14 is generally directed to a mattress including an innercore that is disposed within a cavity defined by a bottom panel top surface and a perimeter sidewall interior surface. An adhesive strip is disposed on the bottom panel top surface in a region proximate to the perimeter sidewall interior surface. The innercore bottom surface and the bottom panel top surface are attached only along the adhesive strip. A remaining portion of the innercore bottom surface is unattached to the bottom panel top surface. Independent claim 16 is directed to similar subject matter as claim 14.

Zocco fails to teach or suggest an adhesive strip disposed on a portion of the bottom panel top surface proximate to the perimeter sidewall interior surface. The Action alleges that Zocco discloses related subject matter at col. 3, line 64 – col. 4, line 2 (Action, page 3). Applicants respectfully disagree. The cited passage states, in one embodiment, that the bottom of a first layer of filling material is glued to a bottom panel (Zocco, col. 3, lines 66-68). Alternatively, Zocco discloses, in another embodiment, that the first layer of filling material is not glued to the bottom panel and is entirely unattached to the bottom panel (Zocco, col. 6, lines 60-63). However, neither of Zocco's embodiments teach or suggest disposing an adhesive strip in a specific region of the

panel or to less than the entire panel, e.g., in a region proximate to the interior surface of the perimeter sidewall. Therefore, Zocco fails to teach or suggest this subject matter.

Next, the Action fails to provide a reason for why one of ordinary skill in the art, when provided with Zocco, would arrive at the given subject matter. The Action merely states that “it would have been obvious for having ordinary skill in the art at the time of the invention to have a region unattached to the bottom surface yielding predictable results that provide a select region of attachment” (Action, pages 3-4). This is not a reason for why one would modify Zocco to replace Zocco’s glue and instead selectively apply an adhesive strip along a region proximate to the perimeter sidewall interior surface. There is nothing in Zocco to suggest selectively applying glue in certain regions. As noted earlier, Zocco is only concerned with whether the layer of filling material is entirely unattached or attached to the bottom panel. Therefore, the Action fails to provide a reason for one of ordinary skill in the art to modify Zocco and arrive at an adhesive strip disposed on a portion of the bottom panel top surface proximate to the perimeter sidewall interior surface.

Furthermore, Applicants carefully selected the specific region of the bottom panel top surface proximate to the perimeter sidewall interior surface, and disposed a strip of adhesive on the specific region. Applicants devised this approach in response to recognizing shortcomings in the conventional approach where an innerspring unit was first attached to a lower border wire which was then joined to the bottom panel (Specification, paragraph [0007]). Neither the Action nor Zocco provide such a reason, or any reason, to modify Zocco and arrive at Applicants’ claimed subject matter. Therefore, Zocco fails to teach or suggest an adhesive strip disposed on a portion of the bottom panel top surface proximate to the perimeter sidewall interior surface, as recited in the claims.

For at least the above reasons, Applicants respectfully request reconsideration and withdrawal of the §103(a) rejections of claims 14 and 16. Since claims 15 and 17-28 depend claims 14 and 16, respectively, and add further limitations thereto, Applicants respectfully request reconsideration and withdrawal of the §103(a) rejections of these dependent claims.

Application No. 10/750,540
Amendment dated March 25, 2011
Reply to Office Action of October 1, 2010

Docket No.: SMCY-P02-099

Conclusion

In view of the above amendment and remarks, Applicants believe the pending application is in condition for allowance.

We believe that we have appropriately provided for the fees due in connection with this submission. However, if a fee is due, please charge our Deposit Account No. 18-1945, under Order No. SMCY-P02-099 from which the undersigned is authorized to draw.

Dated: March 25, 2011

Respectfully submitted,

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